

July 7, 2022

By ECF

Honorable Ona T. Wang
United States Magistrate Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 20D
New York, New York 10007

Re: Joint status letter in *Natural Resources Defense Council, Inc. v. U.S. Department of the Interior*, No. 1:18-cv-650-OTW

Dear Judge Wang:

Pursuant to the Court's Order of April 22, 2021 (ECF No. 62), the parties respectfully submit this status letter regarding the status of Defendants' responses to Plaintiff's Freedom of Information Act (FOIA) requests.

I. Status of searches and productions by the Department of the Interior

The Department of the Interior, acting through the Bureau of Land Management, made monthly productions in response to Plaintiff's FOIA requests (and other FOIA requests) by posting responsive records on its public website through April 2022. Interior also produced a draft *Vaughn* index for each monthly production. At this time, remaining potentially responsive records include roughly 200 emails located on a backup system that Interior has identified and is processing for production. Interior is also searching for two records requested by Plaintiff to determine if they exist and, if so, to process and produce those records. Resolution of these remaining items will complete Interior's production in response to Plaintiff's FOIA requests.

II. Proposed next steps

In light of the foregoing, the parties respectfully offer the following proposals:

- (1) Interior will continue processing the identified potentially responsive records and will resolve Plaintiff's inquiry regarding two other potential records.
- (2) Once the remaining issues have been resolved satisfactorily, NRDC and Interior will meet and confer to discuss a path to resolve this litigation.

Pursuant to the Court's Order of April 22, 2021 (ECF No. 62), the parties will file another joint status report by October 7, 2022, at which time they will update the Court on the progress of the

next steps described above.

Respectfully submitted on this 7th day of July, 2022,

/s/ Francis W. Sturges, Jr.

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